

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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KAITLIN E. WALSH, on behalf of herself, and	:	
all other plaintiffs known and unknown,	:	
	:	
Plaintiff,	:	
	:	Civil Action No. 12-cv-05038
-v-	:	
	:	
"SIX FLAGS ENTERTAINMENT CORPORATION"	:	
D/B/A SIX FLAGS GREAT AMERICA,	:	
	:	
Defendant.	:	
-----	x	

**JOINT MOTION FOR EXTENSION OF TIME
FOR PARTIES TO FILE AN AGREED MOTION FOR
PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

Plaintiff Kaitlin E. Walsh and Defendant Great America, LLC (D/B/A "Six Flags Great America"), sued as Six Flags Entertainment Corporation, D/B/A Six Flags Great America, (collectively the "Parties") respectfully and jointly move this Court for entry of an Order granting it an extension of time up to, and including, August 23, 2013 by which the parties must file an agreed motion for preliminary approval of a class settlement. In support of this Motion, the Parties state:

1. This Motion is brought prior to the expiration of the time this Court ordered the Parties to file an agreed motion for preliminary approval of a class settlement.
2. The current deadline for the Parties to file an agreed motion for preliminary approval of a class settlement is currently June 19, 2013.
3. The Parties jointly request this extension.
4. The Parties have requested one extension of time to file an agreed motion for preliminary approval of a class settlement, which was granted.
5. At the time of the Parties' first request for an extension, the Parties had exchanged

extensive discovery for the purposes of settlement, including the number of putative class numbers and applicable hours worked, walking time and distances throughout the park, park procedures, numerous declarations, and initial damages models. The parties were actively working together in hopes of achieving settlement but required more time to process the information exchanged.

6. Since that time, the Parties have continued to work together diligently and have made considerable progress in their negotiations. After considerable exchange of data and information and collective interaction, the Parties have tentatively agreed to a damages model and are working together to gather the remaining data necessary to calculate the damages according to the agreed model.

7. The Parties continue to work together and believe they will be able to reach a settlement agreement if given additional time to gather the remaining data and finalize the remaining negotiations and calculations. The Parties believe they can obviate the need for considerable and expensive discovery and costly depositions if they are permitted to continue their settlement talks and joint calculations.

For all the reasons stated above, the Parties respectfully request that this Court enter an Order granting it an extension of time up to and including August 16, 2013, to file an agreed motion for preliminary approval of a class settlement.

Dated: June 17, 2013

Respectfully submitted,

By: /s/ John W. Billhorn

By: /s/ Kevin M. Cloutier

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